

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JEFFREY KIRBY,

Plaintiff,

-against-

YONKERS SCHOOL DISTRICT and  
BERNARD PIERARZIO, sued in his  
individual capacity,

Defendants.

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DEFENDANTS' RULE 26(a)(1)  
INITIAL DISCLOSURES

07-10684 (SCR)

ECF Case

Pursuant to FRCP 26(a)(1)(A), Defendants Yonkers School District ("District") and Bernard Pierarzio (*sic*) ("Pierorazio") by their attorneys, Donoghue, Thomas, Auslander & Drohan, LLP, hereby provide the following initial disclosure:

**I. Individuals Likely to Have Discoverable Information That May Be Used to Support  
Defendants' Defenses.**

Disclosure

1. Bernard P. Pierorazio, Superintendent  
Yonkers Public Schools  
One Larkin Center  
Yonkers, NY 10701  
(914) 376-8667
2. Dennis Campanera, Principal  
PEARLS Hawthorne School  
350 Hawthorne Avenue  
Yonkers, NY 10705  
(914) 376-8250
3. Cara Caico, Assistant Principal  
PEARLS Hawthorne School  
350 Hawthorne Avenue  
Yonkers, NY 10705  
(914) 376-8250

4. Susan V. Fierson, Assistant Principal  
PEARLS Hawthorne School  
350 Hawthorne Avenue  
Yonkers, NY 10705  
(914) 376-8250
5. Robert Riccuiti, Principal  
Emerson Middle School  
160 Bolmer Avenue  
Yonkers, NY 10703  
(914) 376-8300
6. Beverly Turner-Nash, Assistant Principal  
Emerson Middle School  
160 Bolmer Avenue  
Yonkers, NY 10703  
(914) 376-8300
7. Michelle Yazurlo, Assistant Principal  
Emerson Middle School  
160 Bolmer Avenue  
Yonkers, NY 10703  
(914) 376-8300
8. Marwan Sayegh, Assistant Principal  
Emerson Middle School  
160 Bolmer Avenue  
Yonkers, NY 10703  
(914) 376-8300
9. Dr. Marta Lugo, Director of Personnel  
Yonkers Public Schools  
One Larkin Center  
Yonkers, NY 10701  
(914) 376-8106
10. Dr. Donna Martuge, Director of Student Registration  
Yonkers Public Schools  
One Larkin Center  
Yonkers, NY 10701  
(914) 376-8000

11. James W. Rose, Director of Health/Physical Education/Athletics  
Yonkers Public Schools  
One Larkin Center  
Yonkers, NY 10701  
(914) 376-8000
12. Sheryl Chasin, Director of Professional Development  
Yonkers Public Schools  
One Larkin Center  
Yonkers, NY 10701  
(914) 376-8000
13. Pasquale Piccirella, Director of Transportation, Safety and Security  
Yonkers Public Schools  
One Larkin Center  
Yonkers, NY 10701  
(914) 376-8000
14. Orlando Menieru, Public Safety Officer  
Emerson Middle School  
160 Bolmer Avenue  
Yonkers, NY 10703  
(914) 376-8300
15. Michael Lanteri, Public Safety Officer  
Emerson Middle School  
160 Bolmer Avenue  
Yonkers, NY 10703  
(914) 376-8300
16. Jane Weinberg, Teacher  
Emerson Middle School  
160 Bolmer Avenue  
Yonkers, NY 10703  
(914) 376-8300
17. Patricia Puleo, President  
Yonkers Federation of Teachers  
35 East Grassy Sprain Road  
Yonkers, NY 10710  
(914) 793-0200

18. Fran Ruggiero, Middle School Vice President  
Yonkers Federation of Teachers  
35 East Grassy Sprain Road  
Yonkers, NY 10710  
(914) 793-0200
19. Carolyn Jones, Parent  
80 School Street, Apt. 5K  
Yonkers, NY 10701
20. Kahssai Duhaney, Student  
c/o Carolyn Jones  
80 School Street, Apt. 5K  
Yonkers, NY 10701

**II. DOCUMENTS AND LOCATION.**

1. Plaintiff's Personnel File  
Yonkers Public Schools  
One Larkin Center  
Yonkers, NY 10701

**III. INSURANCE**

After commencement of discovery, the applicable insurance agreement between the District and ACE USA will be made available for copying and inspection, as required, at the offices of Donoghue, Thomas, Auslander, and Drohan, LLP, 2517 Route 52, Hopewell Junction, NY 12533.

Defendants reserve their rights to supplement their disclosure to the extent necessary and appropriate pursuant to the applicable provisions of the Federal Rules of Civil Procedure.

Dated: June , 2008

Yours, etc.,

DONOOGHUE, THOMAS, AUSLANDER & DROHAN, LLP

By: /s/ Vincent P. D'Andrea  
Vincent P. D'Andrea (6614)  
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